

Hearing Date and Time:  
September 21, 2021 at 10:00 a.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

BLITMAN SARATOGA LLC,

Debtor.

Chapter 11  
Case No. 20-23177 (RDD)

**WITHDRAWAL OF OPPOSITION TO DEBTOR'S MOTION TO APPROVE  
DEBTOR'S SETTLEMENT WITH AKKER FAMILY**

**FRANCIS J. BRENNAN, ESQ.**, an attorney admitted to practice law in the State of New York and the United States District Court for the Southern District of New York affirms under penalty of perjury as follows in with respect to the Debtor's Motion to Approve Debtor's Settlement with Akker Family (the "Motion"), and respectfully submits the following:

1. I am a partner in the law firm of Nolan Heller Kauffman, LLP ("NHK") and am counsel to the Official Committee of Unsecured Creditors (the "Committee") in the Chapter 11 case of Blitman Saratoga LLC ("Debtor").

2. Based upon the Committee's review of the deposit bond in favor of the Akker Family, discussion with respective counsel for the Debtor and Akker Family and in consultation with the chair of the Committee, the Objection filed by the Committee to the Motion is hereby withdrawn.

Dated: September 21, 2021  
Albany, New York

**NOLAN HELLER KAUFFMAN LLP**

*Attorneys for Counsel for the Official  
Committee of Unsecured Creditors*

By: /s/Francis J. Brennan

Francis J. Brennan, Esq,  
80 State Street, 11<sup>th</sup> Floor  
Albany, New York 12207  
(518) 449-3300  
Bar Roll No.: FB0170  
[fbrennan@nhkllp.com](mailto:fbrennan@nhkllp.com)